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January 4, 2023

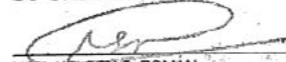
VIA ECF

Hon. Nelson Román  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

Plfs' consented-to request to stay the action is GRANTED. This action is hereby stayed through February 24, 2023. In the event the parties are unable to reach a settlement, Plfs. are to serve (not file) their opposition papers on March 21, 2023 and Def. is to serve its reply papers on April 11, 2023. All motions papers are to be filed by the parties on the reply date, April 11, 2023. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 72.

SO ORDERED:

Dated: January 6, 2023  
White Plains, NY

  
HON. NELSON S. ROMAN  
UNITED STATES DISTRICT JUDGE

**Re: Nancy and Francisco Reyna v. Target Corporation**  
**Docket No.: 20-cv-1233 (NSR)(PED)**

Dear Judge Román:

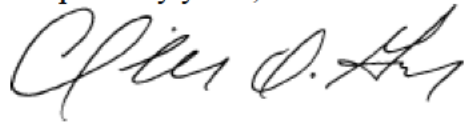
We submit this letter motion as counsel for plaintiffs **Nancy and Francisco Reyna** in the above matter with consent of our adversary to request that the Court impose a temporary stay in this action until February 17, 2023, to allow the parties to pursue private mediation in an attempt at settlement. As there is currently pending a defense motion for summary judgment, counsel for the parties have engaged in limited settlement discussions and would like to explore settlement further at mediation without the specter of a motion looming. Although we have twice requested that the pending motion deadlines be extended, we feel that if given the opportunity to submit this matter to a mediator, there is a strong possibility that a settlement can be reached. If the matter cannot be resolved at mediation, we propose to submit a revised briefing schedule on the pending motion by February 17<sup>th</sup>.

Should the Court wish to address this matter further via conference call, we are available tomorrow afternoon, January 5<sup>th</sup>, or the afternoon of Friday, January 6<sup>th</sup>.

Thank you for your kind attention to this application.

USDC SDNY  
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DATE FILED: 1/6/2023

Respectfully yours,

  
CLIFFORD D. GABEL (CG-4613)

/CDG

cc: Ian Hannon, Esq., SIMMONS JANNACE DELUCA LLP (via ECF)

MEMO ENDORSED